



RYAN P. DRISCOLL
rdriscoll@berchemmoses.com

PLEASE REPLY TO
MILFORD OFFICE
WWW.BERCHEMMOSES.COM

March 13, 2023

Honorable Gregory H. Woods
United States District Judge
United States District Court
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: U.S. ex rel. Donohue v. Carranza, et. al.
1:20-CV-5396 (GHW)(SDA)

Dear Judge Woods,

This firm represents the Stamford Board of Education and its superintendent, Dr. Tamu Lucero (collectively "Stamford"), in the above-referenced matter. Consistent with the request made by the NYCDOE (ECF No. 260) and this Court's Individual Rules of Practice, Stamford respectfully requests an extension of time of thirty (30) days until April 13, 2023, in which to file a motion for attorneys' fees under 31 U.S.C. § 3730(d)(4) and F.R.C.P. Rule 54(d). This is the first requested extension of time and counsel for the Plaintiff-Relator has consented to the request.

Very truly yours,
Berchem Moses PC

Ryan P. Driscoll

cc: All counsel of record via ECF

75 BROAD STREET
MILFORD, CT 06460
TELEPHONE (203) 783-1200
FACSIMILE (203) 878-2235

1221 POST ROAD EAST
WESTPORT, CT 06880
TELEPHONE (203) 227-9545
FACSIMILE (203) 225-1641